

Board of Pharmacy

Initial Statement of Reasons

Subject Matter of Proposed Regulation: Ancillary Personnel

Sections Affected: 1793.3

Specific Purpose of the Proposed Changes:

The Board of Pharmacy has proposed amendments to Section 1793.3 to provide pharmacies with greater staffing flexibility.

Factual Basis/Rationale

The rapid growth in prescription drug coverage over the last ten years has resulted in greater pharmacy workload associated with resolving third party payment conflicts and with increased prescription volume associated with the increased drug coverage. Existing regulations that limit the number of unlicensed ancillary personnel who are primarily employed to resolve such third party payment issues was adopted in 1992 prior to the growth in third party coverage and to handle the data entry workload associated with increased prescription volume. Removing the restriction on ancillary personnel will provide pharmacies with the staffing flexibility needed to provide more efficient service to customers without undermining consumer safety. Increased use of unlicensed ancillary personnel can free the pharmacist to focus on that work requiring a pharmacist's license.

Underlying Data

Excerpt from Trends and Indicators In The Changing Health Care Marketplace, 2002 published by the Kaiser Family Foundation.

“Consumers Face Higher Costs As Health Plans Seek to Control Drug Spending” an *Issue Brief* published by the Center for Studying Health System Change.

Business Impact

This regulation will not have a significant adverse economic impact on businesses. This initial determination is based on the absence of testimony indicating adverse economic impact regarding these rulemaking proposals at the informational hearings held by the board.

Specific Technologies or Equipment

This regulation does not mandate the use of specific technologies or equipment.

Consideration of Alternatives

No reasonable alternative to the regulation would be either more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed regulation.